Senate
Impeachment Court
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Atty. RENATO N. BANTUG JR.
Clerk of the Impeachment Court

REPUBLIC OF THE PHILIPPINES
SENATE
IMPEACHMENT COURT

IN THE MATTER OF:

IMPEACHMENT TRIAL OF
VICE PRESIDENT
SARA ZIMMERMAN DUTERTE

CASE NO. 004-2026

MANIFESTATION

- with -

PROPOSAL ON CERTAIN ADDITIONAL PRE-TRIAL MATTERS

The Prosecution respectfully manifests that, while the parties have made substantial progress during the Pre-Trial Conference, certain practical and procedural matters that may aid the orderly, efficient, and expeditious conduct of trial have not yet been fully resolved. Accordingly, and without prejudice to any further discussions between the parties, the Prosecution respectfully submits the following proposals for the consideration of the Respondent and, ultimately, of this Honorable Impeachment Court:

1. ***On the Use of Filipino and English.*** The Prosecution proposes that the proceedings be conducted in both English and Filipino, with counsel and witnesses permitted to use either language as circumstances may require. The impeachment proceedings involve matters of significant public importance and accountability. As such, it is desirable that the proceedings remain accessible not only to the parties and the Impeachment Court but also to the Filipino public whose institutions are implicated in the process. Permitting the use of both English and Filipino will likewise enable witnesses and counsel to express themselves with greater precision and candor, minimize misunderstandings arising from linguistic limitations, and ultimately facilitate the ascertainment of truth.

2. ***On a Reciprocal Three-Day Witness Disclosure Rule.*** The Prosecution is amenable to the disclosure by both parties of the identities of their intended witnesses at least three (3) calendar days prior to their scheduled presentation before the Impeachment Court. Reciprocal advance disclosure will promote fairness, reduce avoidable surprise, allow meaningful preparation for examination and cross-examination, and minimize requests for postponement that may unnecessarily prolong the proceedings.

3. ***On the Participation of Both Public and Private Prosecutors in Witness Examination.*** The Prosecution respectfully requests that at least two designated prosecutors, including one public prosecutor and one private prosecutor, be permitted to participate in the examination of a witness, whether by dividing portions of the examination or by handling distinct areas of inquiry. The *Articles of Impeachment* involve matters that are extensive in scope and, in some instances, highly specialized in character. Allowing participation by both public and private prosecutors during witness examination will facilitate the efficient presentation of evidence and assist the Impeachment Court in developing a complete factual record. The Prosecution likewise expresses no objection to a similar arrangement being made available to the Respondent.

4. ***On the Opening and Pre-Marking of the Sealed BIR Box and its contents.*** The Prosecution proposes that the sealed box, containing Bureau of Internal Revenue ("BIR") documents, and previously transmitted to the Senate by the House Committee on Justice, be opened, inventoried, and pre-marked under the supervision of the Impeachment Court at the earliest practicable opportunity. The Prosecution notes that both parties have identified BIR-related documents among their respective reserved evidence in their Pre-Trial Briefs (Prosecution's *Pre-Trial Brief* at page 35 onward and Respondent's *Pre-Trial Brief* at page 67, items ii and v), thereby recognizing the possible relevance of such materials to the proceedings. Considering further that the sealed documents are already in the custody of the Impeachment Court, an early opening, inventory, and marking of the contents, with copies made available to both parties, would promote transparency, avoid unnecessary disputes concerning access to the documents, and facilitate the orderly and efficient conduct of trial. Such opening and inventory shall be without prejudice to any objection as to the admissibility, relevance, evidentiary weight, or

any other matter properly raised during the proceedings, and shall not be construed as an admission of any document into evidence.

5. The foregoing proposals do not concern the merits of the case and are submitted solely to facilitate the fair, orderly, and efficient presentation of evidence. To the extent the parties may agree thereon, the Prosecution respectfully submits that their adoption would assist the Impeachment Court in the effective management of the proceedings. To the extent no agreement is reached, the Prosecution respectfully submits the matters to the sound discretion of this Honorable Impeachment Court.

PRAYER

WHEREFORE, premises considered, the Prosecution respectfully prays that:

(a) the Respondent be **DIRECTED** to **STATE** her position on the foregoing proposals;

(b) any matters agreed upon by the parties be **ADOPTED** as part of the governing pre-trial framework; and

(c) with respect to matters on which no agreement is reached, this Honorable Impeachment Court **RESOLVE** the same in such manner as it may deem proper for the fair, orderly, and expeditious conduct of trial.

The Prosecution prays for such further or other relief as may be deemed just or equitable under the premises.

Quezon City for Pasay City, June 24, 2026.

THE PUBLIC PROSECUTORS
FOR THE IMPEACHMENT CASE AGAINST
VICE PRESIDENT SARA ZIMMERMAN DUTERTE
House of Representatives
Constitution Hills
Quezon City, Philippines 1126

By:

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